

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAVID CHASMAN and HAIM SETH
CHASMAN,

Plaintiffs,

-against-

JPMORGAN CHASE BANK, N.A.
CHASE BANK, AND RELATED
SUBSIDIARIES, successor by merger of
FIRST NATIONAL BANK OF CHICAGO,

Defendants.

No. 18-cv-6681 (NRB)

DECLARATION OF
RICHARD FARMER

RICHARD FARMER, pursuant to 28 U.S.C. § 1746, hereby declares as follows:

1. I am a Vice President and Operations Manager for JPMorgan Chase Bank, N.A. (“Chase”). My duties include managing retirement-services operations.
2. The facts set forth herein are based upon my review of Chase’s records maintained in the ordinary course of business, which are attached hereto.
3. Attached hereto as Exhibit 1 and Exhibit 1A are copies of “Traditional IRA Election of Payment by Beneficiary” forms for a beneficiary named David Chasman.
4. Attached hereto as Exhibit 2 is a copy of a “Traditional IRA Election of Payment by Beneficiary” form for a beneficiary named Haim Seth Chasman.
5. Attached hereto as Exhibit 3 is a copy of a letter dated January 13, 2012 sent to David Chasman, which states, among other things, that a retirement certificate of deposit with an account number ending in 8477 (the “D. Chasman CD”) would be maturing on January 30, 2012.

6. Attached hereto as Exhibit 4 is a copy of a letter dated January 13, 2012 sent to Haim Chasman, which states, among other things, that a retirement certificate of deposit with an account number ending in 2413 (the "H. Chasman CD") would be maturing on January 30, 2012.

7. Attached hereto as Exhibit 5 is a copy of an account statement for the D. Chasman CD for the period January 1, 2011 through December 31, 2011.

8. Attached hereto as Exhibit 6 is a copy of an account statement for the D. Chasman CD for the period January 1, 2012 through June 30, 2012.

9. Attached hereto as Exhibit 7 is a copy of an account statement for the H. Chasman CD for the period January 1, 2011 through December 31, 2011.

10. Attached hereto as Exhibit 8 is a copy of an account statement for the H. Chasman CD for the period January 1, 2012 through June 30, 2012.

11. Attached hereto as Exhibit 9 is a copy of the Chase Traditional IRA Custodial Agreement and Disclosure Statement (the "IRA Custodial Agreement") that went into effect with respect to traditional individual retirement accounts at Chase as of January 2007.

12. Attached hereto as Exhibit 10 is a copy of the IRA Custodial Agreement that went into effect as of March 16, 2009.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct. Executed in Indianapolis, Indiana on August 2, 2019.



RICHARD FARMER